

**THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES)	Case No. 17 CR 495
)	
v.)	Judge Andrea R. Wood
)	
ROBERT O'ROURKE)	Magistrate Judge Michael T. Mason

DEFENDANT'S UNOPPOSED MOTION TO MODIFY BOND CONDITIONS

Defendant ROBERT O'ROURKE, by and through his attorneys, and without opposition from the government, respectfully moves this Honorable Court to enter an Order modifying his bond conditions to allow him to travel to St. Louis, Missouri, between May 2, 2019 and May 5, 2019, for purposes of attending his niece's engagement party. In support of this unopposed motion, Mr. O'Rourke states as follows.

1. Prior to trial, the Court ordered Mr. O'Rourke released on a \$4,500 recognizance bond with no pretrial supervision. Dkt. No. 10. Mr. O'Rourke's bond conditions permitted him to travel within the continental United States. *Id.*

2. On February 25, 2019, after the jury returned a guilty verdict on some of the counts of the Indictment, the Court modified Mr. O'Rourke bond conditions ordering that Mr. O'Rourke be supervised by Pretrial Services and restricting his travel to the Northern District of Illinois pending sentencing.

3. Mr. O'Rourke's is scheduled to be sentenced by the Court on June 28, 2019. Dkt. No. 126. However, the government recently filed a motion to continue the sentencing date which is scheduled to be presented to the Court on April 30, 2019. *See* Dkt. Nos. 128 & 129.

4. On April 23, 2019, defense counsel contacted Pretrial Services to seek permission for Mr. O'Rourke to travel to St. Louis, Missouri for purposes of attending his niece's engagement party. Defense counsel was informed that Pretrial Services has not assigned a pretrial officer to

Mr. O'Rourke as Mr. O'Rourke was released on bond with no supervision. Accordingly, Pretrial Services directed defense counsel to file a motion with the Court.

5. As such, Mr. O'Rourke moves this Honorable Court to enter an order modifying his bond conditions to allow him to travel to St. Louis, Missouri, between May 2, 2019 and May 5, 2019, for purposes of attending his niece's engagement party.

6. Defense counsel has conferred with Assistant United States Attorneys Shoba Pillay and Christopher Parente and they have no objection to this Motion.

WHEREFORE, Mr. O'Rourke respectfully moves this Honorable Court to enter an Order modifying his bond conditions to allow him to travel to St. Louis, Missouri, between May 2, 2019 and May 5, 2019, for purposes of attending his niece's engagement party.

Respectfully Submitted,

KULWIN, MASCIOPINTO & KULWIN, LLP

By: /s/ Rachel A. Katz
One of Defendant's Attorneys

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